



**Environmental Protection & Compliance Division**  
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**National Nuclear Security Administration  
Los Alamos Field Office**  
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**MAR 20 2019**

Date:

Symbol: EPC-DO: 19-073

LA-UR: LA-UR-19-22302

Locates Action No.:

Mr. John E. Kieling, Chief  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505-6303

**Subject: Quarterly Progress Report for Period Ending March 31, 2019 Interim Hazard  
Classification (IHC) for Disposal of Trace Explosives in Solvents as a Flammable Liquid,  
EPA ID # NM0890010515**

Dear Mr. Kieling:

This letter responds to a requirement of the New Mexico Environment Department – Hazardous Waste Bureau (NMED-HWB) correspondence dated December 17, 2018 granting an extension for the storage of waste containers that contain solvents and explosives stored over one year to the United States Department of Energy (DOE) and Triad National Security, LLC (Triad), the applicable Permittees. The correspondence requires the applicable Permittees to submit a written quarterly report to the NMED-HWB by March 31, 2019 (and by June 30, 2019) on the progress of obtaining the proper shipping (authorization) for disposal shipment of trace explosives in solvents.

On March 8, 2019, the Interim Hazardous Classification (IHC) for Disposal Shipment of Trace Explosives in Solvents as a Flammable Liquid per shipping authorization was granted by the Department of Energy National Nuclear Security Administration Albuquerque, NM office. As a result of this authorization Los Alamos National Laboratory (LANL) has initiated protocols to ship the trace high explosives (HE) waste containers off site. Additionally, as part of a long-term strategic solution and result of the authorization of the IHC, LANL will now pursue a Department of Transportation (DOT) Special Permit for future trace HE waste streams.



If you have questions or comments concerning this submittal, please contact Karen E. Armijo of the Department of Energy (DOE) at (505) 665-7314 or Steven J. Singledecker (Triad) at (505) 667-5218.

Sincerely,



Enrique Torres  
Division Leader  
Environmental Protection and Compliance Division  
Triad National Security, LLC

Sincerely,



Karen E. Armijo  
Permitting and Compliance Program Manager  
National Nuclear Security Administration  
U.S. Department of Energy

Enclosure: 1) Interim Hazard Classification for Disposal Shipment of Trace Explosives in Solvents  
as a Flammable Liquid (2019-26)

Copy: Janine Kraemer, NMED-HWB, Santa Fe, NM (E-File)  
Neelam Dhawan, NMED-HWB, Santa Fe, NM, (E-File)  
Siona Briley, NMED-HWB, Santa Fe, NM (E-File)  
Don Meyer, NMED-HWB, Santa Fe, NM (E-File)  
William S. Goodrum, NA-LA, (E-File)  
Peter Maggiore, NA-LA, (E-File)  
Jody M. Pugh, NA-LA, (E-File)  
Karen E. Armijo, NA-LA, (E-File)  
Adrienne L. Nash, NA-LA, (E-File)  
Deborah Woitte, GC-ESH, (E-File)  
Susan McMichael GC-ESH, (E-File)  
Michael Hazen, ESHQSS, (E-File)  
Enrique Torres, EPC-DO, (E-File)  
Jennifer Payne, EPC-DO, (E-File)  
Steven Singledecker, EPC-WMS, (E-File)  
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### CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



**Enrique Torres**  
Division Leader  
Environmental Protection and Compliance Division  
Triad National Security, LLC.  
Los Alamos National Laboratory

3/19/19

Date Signed



**Karen E. Armijo**  
Permitting and Compliance Program Manager  
National Nuclear Security Administration  
Los Alamos Field Office  
U.S. Department of Energy

3/20/2019

Date Signed

# **ENCLOSURE 1**

Interim Hazard Classification for Disposal Shipment of Trace  
Explosives in Solvents as a Flammable Liquid (2019-26)

EPC-DO: 19-073

LA-UR-19-22302

Date: MAR 20 2019



Department of Energy  
National Nuclear Security Administration  
P.O. Box 5400  
Albuquerque, NM 87185



March 8, 2019

MEMORANDUM FOR JOSE' MUNOZ

ASSISTANT MANAGER FOR OPERATIONS, NA-LA

FROM:

  
KEVIN CARR  
EXPLOSIVES HAZARD CLASSIFIER, NA-531

SUBJECT:

Interim Hazard Classification for Disposal Shipment of Trace  
Explosives in Solvents as a Flammable Liquid (2019-26)

1. The following Interim Hazard Classification (IHC) is issued for Disposal Shipment of Trace Explosives in Solvents as a Flammable Liquid:

Department of Transportation (DOT)

Hazard Class/Division: 3

Identification Number: UN 3379

Proper Shipping Name: Desensitized explosive, liquid, n.o.s.  
(CL-20)

DOT Container Marking: DESENSITIZED EXPLOSIVE, LIQUID,  
N.O.S. (CL-20)  
UN 3379

DOT Label: 3

Net Explosive Weight: Not to exceed 5% explosive by weight

This article is required to be packaged in accordance with 49 CFR 173.201.

This IHC is granted for shipment of explosives on behalf of the Department of Energy (DOE). This IHC is not applicable for shipment of explosives by private contractors for non-DOE contracts.

2. The IHC is valid until March 7, 2020.

3. The IHC has been assigned in accordance with 49 CFR 173.56(b)(3), DOT-SP 15448, dated November 12, 2014, and TB 700-2, Chapter 3, dated July 30, 2012.  
Transportation carrier used to carry the above explosives must have a copy of this IHC and DOT-SP 15448, dated November 12, 2014, onboard the conveyance.
4. Questions concerning this IHC should be directed to my office at (505) 845-4888.

cc:

W. Winters, LANL  
J. Richardson, LANL  
M. Griego, LANL  
B. Whitaker, NA-LA  
L. Hay, PNNL